



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY  
*P.O. Box 47775 • Olympia, Washington 98504-7775 • (360) 407-6300*

March 14, 2002

**CERTIFIED MAIL**

Mr. Les D. Lonning  
Cascade Pole and Lumber Company  
PO Box 1496  
Tacoma, WA 98401-1496

Re:    A.     Clarifying and Modifying NPDES Permit WA00379533  
       B.     Final Modifications Subject to Public Notice. Comment and Appeal

We issued NPDES Permit WA00379533 to Cascade Pole and Lumber Company on February 7, 2002. You recently brought to our attention items for clarification and modification. We concur that some of the permit language may not reflect our intent and adopt here these clarifications and minor modifications as part of NPDES Permit WA00379533. The permit effective date remains March 15, 2002. The clarifications and minor modifications will go into effect on March 15, 2002 as part of the permit. The final date for filing an appeal remains March 21, thirty days from February 19, the date you received a copy of the permit through certified mail.

We also intend to consider a final set of modifications to the permit subject to public review. Because these final changes are not minor, as minor modification is defined in CFR 122.63, they will be subject to separate public notice, comment and appeal.

We appreciate your bringing these items to our attention:

**CLARIFICATIONS AND MINOR MODIFICATIONS**

**1. Special Condition S1 E. (Diffuser Modification Notification)**

**The item reads:**

Within three years of the effective date of the permit, the Permittee shall modify the diffuser for Outfall 002 in the Puyallup River if necessary to meet water quality standards outside of the mixing zone described in D.ii above and notify the Department of any such modification.

**Clarification:** This provision applies should Cascade Pole elect to re-do its mixing zone study per Special Condition S15 and should Ecology adopt alternative final effluent limits for copper and chromium from such study. If Cascade Pole does not re-do its mixing zone study, it need not modify its diffuser as Ecology used the existing diffuser configuration to calculate the default final effluent limits for copper (159 ug/l) and chromium (138 ug/l).

## **2. Special Condition S16 C., 1<sup>st</sup> Bullet (Cover/Isolate Treated Dimensional Lumber Bundles)**

### **The item reads:**

- The permittee will completely top and side wrap all treated dimensional lumber bundles with no lumber leaving covered drying or storage areas until it has been so wrapped; or completely cover or otherwise completely isolate from contact from rainfall and stormwater runoff all bundled dimensional lumber.

**Clarification:** This provision applies to newly treated lumber stored on-site on or after May 14, 2002 (60 days from the permit effective date).. This provision does not apply to treated lumber or newly treated lumber stored on-site before May 14, 2002. Ecology expects that within 60 days of the permit effective date, Cascade Pole will sell its stock of partially wrapped lumber and remove it from the property. Ecology's expectation in this matter is based upon normal sales. The actual time to sell and remove the inventory of partially wrapped stock may vary. Drying refers to post-treatment drying.

## **3. Special Condition S16 C., 2<sup>nd</sup> Bullet (Cover/Isolate Other Treated Wood Products)**

### **The item reads:**

- The permittee will completely cover or otherwise completely isolate from contact from rainfall and stormwater runoff all other treated wood products and newly stored treated wood products. Newly stored refers to treated products that Cascade Pole brings on site for storage and/or re-sale.

**Clarification:** This provision applies to newly treated poles and railroad ties that are stored on-site on or after May 14, 2002 (60 days from the permit effective date).. This provision does not apply to treated poles and railroad ties stored on-site before May 14, 2002.

## **4. Special Condition S16 C., 6<sup>th</sup> Bullet (Divert to Recycle for Process Areas)**

### **The item reads:**

- The permittee will divert to recycle all stormwater from drainage basins that contain fixed process equipment.

**Clarification:** Presently, Cascade Pole's fixed process equipment drains to recycle. In our most recent inspections, we documented fugitive stormwater in the vicinity of the PCP drip pad. After our most recent site visit (February 20, 2002) it appears to us that this contamination is primarily

associated with the trams used to transport the poles. We expect to work with Cascade Pole and our Hazardous Waste and Toxics Reduction Program staff in the first year of the permit to better understand and address this issue. In the interim, Cascade Pole should inspect and if necessary wipe down the tram after unloading poles from the PCP drip pad.

## **5. Special Condition S17 C**

### **The third paragraph reads:**

Within 60 days of the effective date of this permit, the permittee will notify the Department of its intent to either a) prepare the Pollution Prevention Engineering Report described under this condition or b) implement best management practices (Special Condition 16C).

### **Item C.3 reads:**

Within thirty (30) days of the effective date of this permit, Cascade Pole and Lumber Company submit a Draft Study Plan for the Phase I Report....

**Note:** These due dates are reversed. This is a typographical error.

### **Modification: From the permit effective date, the third paragraph will read:**

Within 30 days of the effective date of this permit, the permittee will notify the Department of its intent to either a) prepare the Pollution Prevention Engineering Report described under this condition or b) implement best management practices (Special Condition 16C).

### **Modification: From the permit effective date, Item C.3. will read:**

Within sixty (60) days of the effective date of this permit, Cascade Pole and Lumber Company submit a Draft Study Plan for the Phase I Report....

## **ADDITIONAL PROPOSED MODIFICATIONS**

We do not now adopt these modifications but intend to publish them for public review and comment. We anticipate that these modifications will become effective on or about May 1, 2002.

## **1. Special Condition S16 C., 1<sup>st</sup> Bullet (Cover/Isolate Treated Dimensional Lumber Bundles)**

### **Modification (add language to this item):**

By September 1, 2002, all treated dimensional lumber bundles stored on site will be completely top and side wrapped; or completely covered, or otherwise completely isolated from contact from rainfall and stormwater runoff.

**2. Special Condition S16 C., 2<sup>nd</sup> Bullet** (Cover/Isolate Other Treated Wood Products)

**The item reads:**

- The permittee will completely cover or otherwise completely isolate from contact from rainfall and stormwater runoff all other treated wood products and newly stored treated wood products. Newly stored refers to treated products that Cascade Pole brings on site for storage and/or re-sale.

**Modification** (add language to this item):

As an alternative to cover and isolation, Cascade Pole may store these “other wood products” (treated poles and railroad ties) in a location where stormwater drains to recycle or to Outfall 001, provided that if stormwater drains to Outfall 001, Cascade Pole will operate and maintain its mixed media treatment system and meet effluent limit defined in Special Condition 1.

I also understand that Cascade Pole has moved forward to begin complete wrapping of its dimensional lumber in advance of permit requirements. I greatly appreciate your good-faith effort in this matter.

I am enclosing copies of the modified permit pages for your file. If you have any questions regarding this matter, please call Greg Zentner of my staff at (360) 407-6289.

Sincerely,

***original signed by Kelly Susewind***

Kelly Susewind, P.E.  
Southwest Region Manager  
Water Quality Program

KS:GZ:nsI

Enclosures

Cc: Bill Sullivan, Puyallup Tribe of Indians  
Laurie Valeriano, Washington Toxics Coalition  
Wendy Church, Citizens for a Healthy Bay